

April 11, 2017 Via email to: <u>CBSC@dgs.ca.gov</u>

Michael Nearman Deputy Executive Director California Building Standards Commission 2525 Natomas Park Drive, Suite 130 Sacramento, CA 95833

RE: 2016 Intervening Code Adoption Cycle – 45-Day Public Comment Period

Dear Michael:

PMI Board of Directors

Peter Jahrling, Sloan Valve Company President

> Scott McDonald Fluidmaster, Inc. Vice-President

Nate Kogler Bradley Corporation Secretary-Treasurer

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Delta Faucet Company
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Chip Way Lavelle Industries, Inc. Plumbing Manufacturers International (PMI) appreciates this opportunity to provide additional comments to the California Building Standards Commission (BSC), California Department of Water Resources (DWR) and California Department of Housing and Community Development (HCD) as the departments consider mandatory building standards for recycled water systems.

Consistent with our public comments and testimony in the forums within which the proposed regulations have been considered and developed, as well as the recommendation of the GREEN-PEME Ad Hoc Code Advisory Committee (CAC), PMI continues to advocate that mandatory building standards for indoor recycled water use be referred for further study and not be pursued in the 2016 intervening code adoption cycle.

PMI acknowledges and supports the current draft of the proposed regulations that BSC, DWR and HCD have released for the 45-day public comment period in the 2016 intervening code adoption cycle. PMI concurs with the state agencies that it is premature for California to adopt regulations mandating the use of recycled water indoors until key issues are addressed and resolved including essential scientific studies and recycled water impact on plumbing product performance.

In closing, PMI thanks BSC, DWR and HCD for the opportunity to provide comments. Our partnership with the regulatory and stakeholder communities in the State of California will continue to promote water efficiency that will produce safe, sanitary, efficient and reliable products.

Sincerely,

Matt Sigler, Technical Director
Plumbing Manufacturers International

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cc: PMI Board of Directors